

**From:** [Laidlaw, Tina](#)  
**To:** ["Suplee, Mike"](#)  
**Subject:** RE: LOT definition  
**Date:** Thursday, June 06, 2013 6:59:07 AM

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I'll check on this one. I know HQs was concerned that we would have to act on the numbers and that we may not approve them... I'll do some follow-up and get back to you on this one.

Tina

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**From:** Suplee, Mike [mailto:msuplee@mt.gov]  
**Sent:** Wednesday, June 05, 2013 5:14 PM  
**To:** Laidlaw, Tina  
**Subject:** RE: LOT definition

Hi Tina;

I am not sure how the NWG folks would react to this. It is pretty squishy; at least or LOT numbers are values that most waste water engineers agree can be met consistently and routinely.

This may be a legal issue so I am guessing here, but wouldn't EPA be able to comment on the LOT numbers in DEQ-12 during each triennial review even if we don't do anything, per that language that EPA added in the rule package last year?

Let me know what you think,

Mike

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**From:** Laidlaw, Tina [mailto:Laidlaw.Tina@epa.gov]  
**Sent:** Friday, May 31, 2013 2:46 PM  
**To:** Suplee, Mike  
**Subject:** LOT definition

Mike,

One other thing I noticed. Did you mean to include the LOT definitions? In our comments, we recommended this language for the circular with the following note about whether we would approve 4 mg/L TN and 70 ug/L TP.

1. **Limits of technology** means the best wastewater treatment processes that exist for the removal of nitrogen and phosphorus compounds from wastewater. [\[TL1\]](#)

That's all for this week.

Tina

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EPA is concerned about having numbers in rule since we may have to review and approve the proposed LOT concentrations.